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Comments by WWF International Danube-Carpathian Programme, WWF Austria, WWF Germany, and WWF Hungary on the Draft Danube River Basin District Management Plan, version 6.0 of 18 May 2009

A) General comment

WWF would like to acknowledge the work done by ICPDR and the Danube countries in developing the roof level of the Danube River Basin Management Plan.

We value the visual presentation of data in form of tables and maps, and would like to request that underlying data was made available and easily accessible in line with transparency provisions of the Water Framework Directive and as a matter of good data policy. In addition, we expect this to be improved in the coming years in line with the developments of the Water Information System for Europe (WISE) and implementation of the Directive 2007/2/EC (the INSPIRE Directive).

B) Comment on specific sections of the Draft Plan (*numbers and titles below indicate the relevant chapter of the draft Danube River Basin Management Plan*)

1.3. The Danube Basin Analysis 2004 – analytical basis for the DRBM Plan

WWF believes that the issue of sediment imbalance was not properly considered in the Danube Basin Analysis and the identification of significant water management issues, thereby contrary to the evidence that exists (see WWF report "[Assessment of the balance and management of the Danube waterway](#)", Vienna, February 2008). Consequently, management objectives and draft Programme of Measures do not adequately address this important basin-wide issue. We understand that sediment quantity and quality are mentioned under "2.1.5 Other issues", but would urge the Danube countries to commit themselves to ensure WFD compliance, in particular for sediment extraction, already in the framework of the current Danube River Basin Management Plan. We would also welcome a stronger statement in the "Key Conclusions" that management of all forms of sediment (from fine sediment to bedload) will be given a more adequate role in the next cycle of the River Basin Management Plan and that meanwhile, Danube countries will collect missing data and fill knowledge gaps, so that the issue can be meaningfully dealt with.

2.1.4.1. River and habitat continuity interruption as a significant pressure

WWF criticizes the present definition of continuity interruption is too much focused on the question whether fish are able to migrate upstream, while downstream fish migration, migration of other fauna, continuity for sediment transport and connectivity between the river and adjacent wetlands are other important aspects that need to be assessed in order to ensure a healthy river system. This criticism is shared by Bund Naturschutz. Moreover, we would like to note the importance of movement by individual organisms, as opposed to measuring population connectivity, is also an

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important factor of assessing habitat continuity, i.e. for a given species, enough members of the species are able to move between isolated populations -- whether upstream or down -- to ensure that populations remain healthy and not too isolated.

2.1.4.2. Hydromorphological alterations / Disconnection of adjacent wetlands/floodplains

Most countries have identified considerably fewer and smaller areas with a potential for floodplain restoration than is possible according to an assessment carried out by WWF; see the map in Annex 1 "Floodplain restoration areas and large still existing floodplain areas along the Danube and major tributaries" (Draft of 12 February 2009), which has been shared with ICPDR and the Danube countries. Taking into account the importance of floodplain restoration to face up to the major water challenges in the Danube basin, whether pollution, hydromorphological alterations or impacts from climate change, WWF urges Danube countries to reconsider the floodplain restoration potential nationally and to make the best use of the WWF map provided. Such restoration will assist with the likelihood of increasing frequency and severity of flood events, as well as reduce overall exposure to climate change induced disasters. WWF remains committed to providing information and support.

2.1.4.4. Hydromorphological alterations/ Future infrastructure projects (FIP)

This list of FIP has obvious gaps, such as navigation projects announced by governments in Hungary and Croatia. WWF strongly believes that all projects of cross-border ecological impacts, regardless of their size, need to be reported and analysed in the roof Plan. WWF has compiled a draft list of FIPs (see Annex 2) that to its knowledge are in the planning phase and are expected to have cross-border and considerable environmental impacts.

4. Monitoring Network and ecological/chemical status / 4.1.4. Final designation of HMWB

The Bulgarian and Romanian Danube River water bodies are entirely designated as heavily modified as a final designation, however the crucial biological data in support of this designation is still missing. This is clearly against the legal requirements of the WFD as well as a number of the WFD Common Implementation Strategy outputs (e.g. Guidance on the Designation of the HMWB). In addition, this raises a question of the inconsistent application of this provision of the WFD - the Lower Danube has been much less altered than the Upper Danube, whose water bodies are at least in part designated as natural. WWF appreciates that, according to the statements Romanian representatives made at the recent Stakeholder Forum, Romania is presently reconsidering this designation and we expect the designation to change over the coming months.

With regard not only to water body designation, but also other water management data and issues of the joint Bulgarian-Romanian stretch of the River Danube, we are highly critical of the fact that Bulgaria and Romania have not actively cooperated which is against the letter and spirit of the WFD. Status data and measures have been developed by Romania unilaterally. We regard this as



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a grave mistake and expect ICPDR and European Commission to facilitate close cooperation of the two countries on these issues without further delay.

5.2 Exemptions according to Art 4 (4), 4 (5) and 4 (7)

WWF notes with concern a high number of exemptions, especially according to WFD Art. 4 (4). However, the Danube Roof Plan neither includes analysis of what the main justifications for these exemptions were, nor clarifies whether, in case of exemptions for an extended deadline, a summary of the measures to achieve good status by the extended deadline and the expected timetable for their implementation were set out in the draft River Basin Management Plans. This was agreed by the Water Directors in 2007 and we believe such analysis should be included in the Danube Roof Plan.

WWF is also critical of how the WFD Art. 4 (7) has been applied in the cases of the future infrastructure projects in the Danube. According to table 7, an exemption in line with the Art 4 (7) has been applied for a number of the planned new modifications, however, the justification for applying the exemptions or assessment if the art 4 (7) conditions have been met, is missing.

For example, while WFD Art. 4 (7) studies are indicated for the ISPA 1 and 2 navigation projects, they have neither been made public yet. Ukraine indicated that a SEA was conducted on the Bystroe project, but no such assessment has been made available either.

WWF urges Danube countries to put these and other documents justifying the exemptions to public scrutiny and to conduct WFD Art. 4 (7) studies and integrated Strategic Environmental Assessments and Environmental Impact Assessments on all FIP projects likely to cause deterioration in water status or prevent achievement of the WF environmental objectives.

6.4. Economic control tools

The Danube River Basin Management Plan does not make it clear enough whether the infrastructure that cause impoundment of water and serve other water uses (e.g. hydropower, navigation, flood defense) is regarded as water service - which WWF believes it should - for which cost recovery analyses need to be provided according to the WFD. Moreover, WWF would like to draw the attention to the fact that environmental and resource costs are not taken directly into account in most countries (contrary to the requirements of the directive), while we believe that cost recovery calculations of water protection measures should include benefits for human health, biodiversity and ecosystem services. We would therefore welcome a work programme in the Plan on the development of the necessary database and methodology (e.g. Payment for Ecosystem Services) for such cost recovery calculations until 2015. We also expect the Danube River Basin Management Plan to make a link between the analysis of pressures and impacts and the economic sectors responsible, with the economic analysis and clear information who uses and pollutes and



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who pays, and how much and for what. The WFD also requires that different water users make adequate contribution to the recovery of the costs in line with the polluter pays principle.

WWF believes that there is a missing link between the chapter 6.4 on economic control tools and chapter 7 on Joint Programme of Measures since the latter does not seem to include economic tools, such as water pricing, as measures of the Danube wide importance. The economic tools are also overlooked when the funding of the Programme of Measures is discussed in chapter 7.4.

7.2.3 Nutrient pollution / Summary of measures on basin-wide importance

The scenarios for nutrient reduction show a) that the intensification of agriculture make the region less likely to meet its pollution reduction targets, and that b) a ban on phosphates in detergents will help the region significantly to meet its targets. Both scenarios depend heavily on the EU policy framework and the follow-up national implementation approaches. Although these thoughts are implicitly mentioned in chapter “7.5. Preliminary key conclusions”, WWF would favour a stronger signal towards the European Commission and national governments that support is needed by making the Common Agricultural Policy, in particular its Pillar II Rural Development, directly contributing to WFD objectives and by implementing an EU-wide ban on laundry and dishwasher detergents, which would significantly influence the market and legal framework of neighbouring non-EU countries as well.

WWF is also missing a reference to the negative effect of Future Infrastructure Projects on the self-cleaning potential of the river system and consequently on nutrient loads to the Danube basin rivers and the Black Sea.

7.1.4.1. Hydromorphological alterations / Interruption of River and Habitat Continuity

On the one hand, WWF very much appreciates the high level of ambitions by some countries to e.g. re-establish river continuity, but urges that the quality of such measures is not sacrificed for quantity. On the other hand, ambitions, both with respect to timelines and overall goals, differ greatly from country to country and measure to measure. On the short term, we strongly encourage the development of a mechanism for the equitable sharing of the financial burden of measures, taking into consideration that the economies of Danube countries differ in their size and strength and measures are sometimes most needed in countries with the lowest GDP. However, in the medium to longer term, if environmental costs are properly internalised (see comment on chapter 6.4.) and measures holistically planned, we expect that investments into a free-flowing river system will pay for themselves.

While WWF appreciates the emphasis on sturgeon as an indicator species and focus for action, we would recommend highlighting at least one other Danube basin fish species of economic and ecological importance but of different habitat preference, such as the endangered Danube salmon (*Hucho hucho*), living in oxygen rich mountain streams. This would be helpful not only for prioritizing



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measures but also for communicating the importance of habitat continuity to all Danube stakeholders,

While WWF is well aware that restoring large floodplain areas is a major endeavour that might take several decades to complete, it is of utmost importance to target an ambitious goal and start activities now because of the numerous benefits of floodplain restoration. These range from their positive effect on achieving good ecological and chemical status to groundwater replenishment (e.g., in Hungary), flood defence (“green infrastructure”), reed harvest, and a boost to biodiversity, thereby helping to adapt to the effects of climate change, stop biodiversity loss, and support the declining rural economies in the region. We would therefore expect all countries to set qualitative restoration targets and secure floodplain restoration sites through (no or low cost) spatial planning measures, and for each country to prepare at least one large scale (min. 1000 ha) restoration project before 2015 in order to show commitment and generate precious know-how, which can be shared among all Danube countries. As stated under 2.1.4.2. (see above), the potential for floodplain restoration is much higher than the countries indicate in the status report and the Programme of Measures.

WWF would be in favour of developing a prioritisation mechanism for floodplain restoration, modelled after the methodology for prioritising measures for achieving longitudinal connectivity.

7.1.4.4. Hydromorphological alterations / Future Infrastructure Projects

The Danube RBMP states that about 50% of Future Infrastructure Projects are dedicated to navigation, thereby highlighting that a key challenge of the coming years will be to develop these projects in line with the non-deterioration obligation of the WFD, independently of the designation of the water body, or to rigorously apply Article 4 (7) of the WFD. Also, the Strategic Environmental Assessment Directive, the Environmental Impact Assessment Directive, and the Espoo Convention have to be complied with. The ISPA projects in Romania and Bulgaria, as well as navigation projects in Hungary, Serbia and Croatia according to our judgement violate the non-deterioration clause without providing acceptable WFD Article 4 (7) studies. Strategic Environmental Assessments are still missing and as large stretches of the Lower Danube are NATURA 2000 sites, WWF is also concerned that these navigation projects will violate the Bird and Habitats Directives. We furthermore doubt very much that the promised economic and environmental benefits of those projects will outweigh the negative effects on ecosystem goods and services and local communities.

WWF strongly supports the Joint Statement process, but is concerned that positive effects will only be felt in a few years. We therefore suggest incorporating into the DRBM Plan the pledge of delivering high quality environmental and strategic impact assessments as well as detailed, adequate WFD Article 4 (7) studies with sufficient transparency and high standard public participation processes for all navigation projects.

7.7 Preliminary key conclusions



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The development of a Danube Strategy modelled on the recently adopted Baltic Sea Strategy, with a strong focus on the water environment and sustainable development, can potentially help to develop and prioritise wise, forward looking measures and less harmful FIPs. WWF welcomes the development of such a Strategy and hopes it will provide a framework for a truly sustainable development of the region.

WWF supports the statement that “knowledge and understanding of the interlinkages between Danube loads and the ecological response in the NW shelf of the Black Sea still need to be refined and improved” but would like to highlight that all reasons for high nutrient loads have to be considered, including hydromorphological alterations, Future Infrastructure Projects, and climate change.

8.2. Climate Change and the DRBD

WWF appreciates the statement of chapter 8.2.1. that climate change signals and knowledge are sufficient to act now and that FIPs need to be climate resilient, but chapter 8.2.2. does not outline clearly enough what that means in terms of work to be done over the coming years. WWF would therefore offer its support in redrafting this chapter (extending it by max. two pages) in order to provide guidance on how the DRBD can become climate resilient until 2015, as requested by the European Commission’s White Paper on climate change adaptation and agreed by the EU Water Directors.

In particular, the following elements should be included:

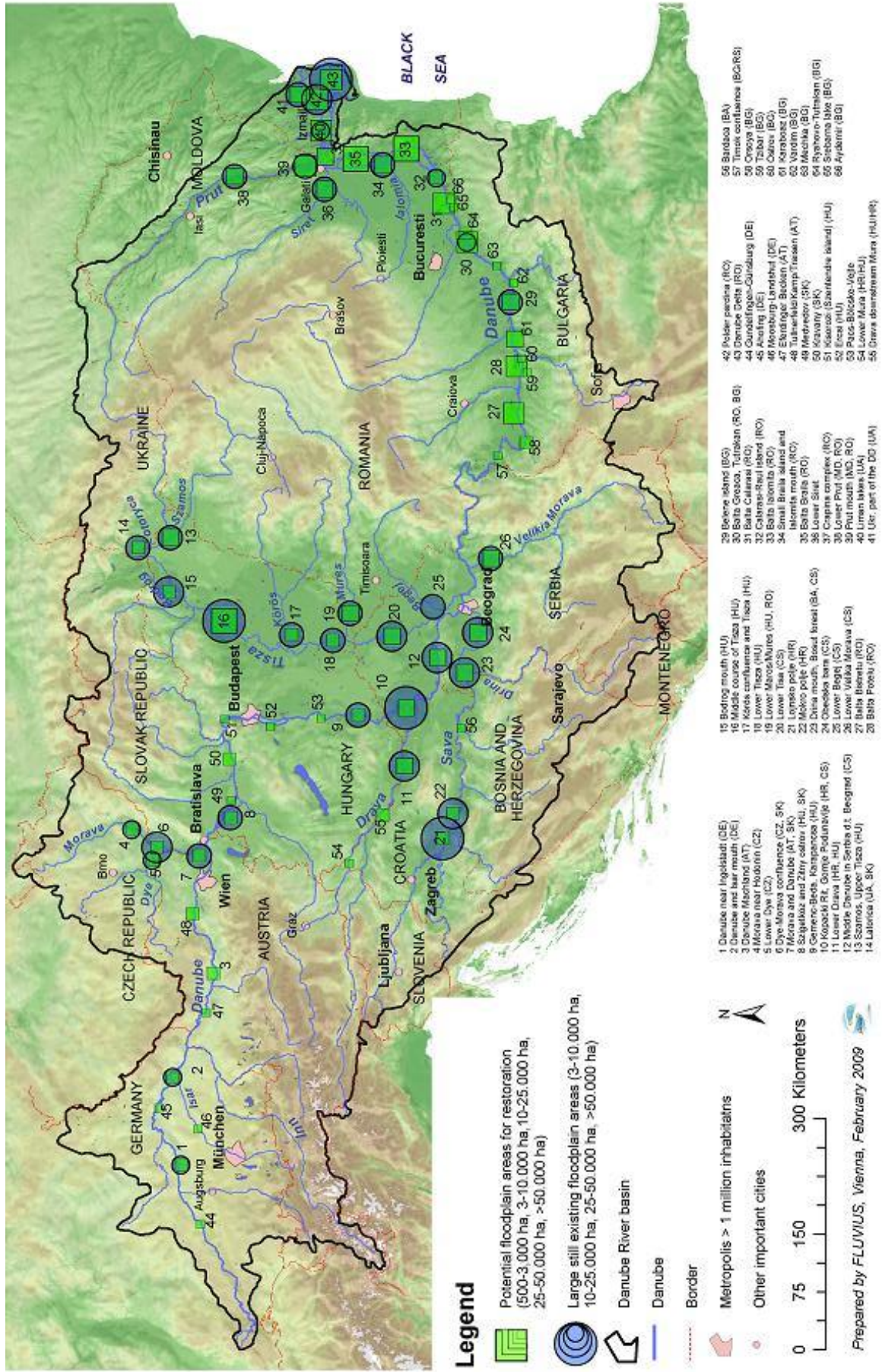
- objectives for making the Plan climate resilient until 2015 (quite a few are listed already in this chapter but without a clear deadline)
- the need of a climate vulnerability assessment of basin ecosystems and water management institutions as soon as possible as a basis for developing basin-wide and regional climate adaptation plans
- objectives for making the further planning climate resilient beyond 2015
- some general concepts of water management adaptation such as living with uncertainty, the importance of ecosystem connectivity and of maintaining adaptive capacity and flexibility
- a clear statement that the FIP currently listed as part of the DRBMP need to undergo a “climate check”, for which a methodology has to be agreed upon
- a number of examples of “no regret or low–regret measures”.

Attachments

Annex 1: WWF floodplain restoration potential map ([see below](#))

Annex 2: Shadow list of Future Infrastructure Projects in the Danube basin as compiled by WWF ([see separate attachment](#))

Annex 1: WWF floodplain restoration potential map



Annex 2: Future Infrastructure and Gravel Extraction Projects in the Danube River Basin

Version: 31 July 2009

The following draft information was collected by WWF and NGO partners in the Danube region. As of the date above, the projects listed below are not included in Annex 07 of the Danube River Basin Management Plan.

FUTURE INFRASTRUCTURE PROJECTS

Definition:

a. Danube River:

an SEA/EIA is being elaborated for the project **or** the project is expected to have a transboundary effect

b. Other surface waters of the DRBD, except the Danube River:

an SEA/EIA is being elaborated for the project **and** the project is expected to have a transboundary effect

Country	Name River	Name project	Main purpose	Description	Project status	Transboundary impact	SEA	EIA	Exemption
DE	Danube	TEN-T project between Straubing-Vilshofen	Navigation	Different river engineering alternatives, possibly in combination with hydropower plant construction	Officially planned	No	No	Investigations ongoing	
HR	Drava	Regulation of Mura-Drava mouth – rkm 236	Flood protection, erosion control and bank protection	Canalization and stabilization of the natural Mura river mouth into the Drava	Officially planned	Yes	No	In progress	No
HR	Drava	Regulation of Drava from rkm 0 to rkm 56	Navigation and flood control	River bank works with T groynes and stone barriers	Officially planned (works in progress)	Yes	No	Yes (approved)	No

HR	Drava	HPP Osijek	Hydropower, flood control, irrigation	A reservoir is planned to be built from Osijek to Donji Miholjac that will be used for power production, flood control, irrigation, and navigation.	Planning in progress	Yes	No	No	No
HR	Danube	Stabilization of river bank rkm 1405-1407	Navigation	Bank stabilization and construction of T- groynes	Officially planned (works in progress)	Yes	No	No	No
HR	Danube	Regulation of rkm 1410-1433	Navigation	Bank stabilization and construction of T- groynes	Officially planned	Yes	No	No	No
HR	Danube	Regulation of rkm 1380-1410	Navigation	Bank stabilization and construction of T- groynes	Officially planned	Yes	No	No	No
HR	Danube	Regulation of rkm 1350-1380	Navigation	Bank stabilization and construction of T- groynes	Officially planned	Yes	No	No	No
HR	Danube	Regulation of Kopacko Lake outlet channel	Tourism Development (?)	Regulation of the main channel and Kopacko Lake outlet	In progress	No	No	No	No
HR	Danube-Sava	Danube-Sava Canal	Navigation, irrigation, recreation	Construction of 60 km artificial canal (category VII) from Vukovar to Samac on the Sava River; will shorten the waterway (850 mill. EUR)	Officially planned	Yes	No	In progress	No

HR	Sava	Reconstruction of Sava waterway	Navigation	Reconstruction of the waterway, and upgrading it to Category Va	Officially planned	Yes	No	No	No
HR	Mura	Regulation works on the Mura River	Flood protection	Bank stabilization, construction of T-groynes, shortening meanders	Works in progress	Yes	No	No	No
HU	Danube	TEN-T project along entire Hungarian stretch	Navigation	River regulation, dense groyne fields	Officially planned	No	Intended	Intended	Yes
RO	Danube	Macin Dam	Hydropower	Energy production, water abstraction for Cernavoda NPP	Mentioned in Romanian 2007-2010 National Energy Strategy	Yes	No	No	?
RO/BG	Danube	Turnu Magurele / Nikopol Dam	Hydropower	Energy production	Mentioned in Romanian 2007-2010 National Energy Strategy	Yes	No	No	?
RS	Danube	Port of Kovin	Navigation, transport and manipulation of goods	Construction of the Kovin Port is planned at rkm 1108 on the left Danube bank with an area of 60 ha. The port is of basin	Planned	No	?	?	?

				type with 10 ha water area and 6m depth with 4 mooring places. The planned length of the quay is 600 m.					
RS	Danube	Hydropower plant Djepdap	Hydropower, navigation	Restoration of the existing hydropower plant as well as construction of a watergate	Planned	Yes	?	Yes	?
SR	Danube	Port of Apatin	Transport and manipulation of goods	Building of a new port at km 1401. It is supposed to be the first port after the entry of the Danube from Hungary into our country. The planned port is within the borders of Special Nature Reserve Gornje Podunavlje, listed as a Ramsar site.	Planned	Yes	No* See note below	No* See note below	No
SR	Danube	Port "Dunav", Pancevo	Port restoration and enlargement	"Danube" Port Pančevo A.D. at rkm 1153 on the left Danube bank covers an area of 240 ha. The port is of basin type and has a water area of 21 ha and 5 m	Planned	No	?	?	No

				depth, with 9 mooring places for the simultaneous accommodation of ships. The total length of the vertical quay is 860 m.					
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*Note: According to information we have received from the Institute for Nature Conservation of Serbia and the Serbian Ministry of Environment and Spatial Planning, no EIA or SEA studies exist or are intended for the Apatin Port project. WWF requests ICPDR to check this conflicting information with the Serbian delegates.

GRAVEL AND SEDIMENT EXTRACTION PROJECTS

Country	Name River	Name project	Main purpose	Description	Project status	Transboundary impact	SEA	EIA	Exemption
HR	Drava	Technical maintenance of the watercourse	Gravel excavation	9 different spots on the Mura and Drava should be excavated for 500.000-1.000.000 m ³ of gravel	Officially planned	Yes			